

**Commonwealth of Kentucky  
Environmental and Public Protection Cabinet  
Department for Environmental Protection  
Division for Air Quality  
803 Schenkel Lane  
Frankfort, Kentucky 40601  
(502) 573-3382**

**DRAFT**

**Title V  
AIR QUALITY PERMIT  
Issued under 401 KAR 52:020**

**Permittee Name:** Mouser Custom Cabinetry, L.L.C.  
**Mailing Address:** 2112 N. Hwy 31 W.  
Elizabethtown, Kentucky 42701

**Mailing Address:** Same as above

**Source Name:** Same as above  
**Mailing Address:** Same as above

**Source Location:** 2112 N. Hwy 31 W.  
Elizabethtown, Kentucky 42701

**Permit Number:** V-05-008  
**Log Number:** 54976  
**Review Type:** Title V, Synthetic minor, NESHAP  
**Source ID #:** 21-093-00043  
**AI #** 35221

**Regional Office:** Frankfort Regional Office  
643 Teton Trail, STB B  
Frankfort, KY 40601  
(502) 564-5043

**County:** Hardin

**Application**  
**Complete Date:** December 01, 2004  
**Issuance Date:**  
**Revision Date:**  
**Expiration Date:**

---

**John S. Lyons, Director  
Division for Air Quality**

## TABLE OF CONTENTS

SECTION	DATE OF ISSUANCE	PAGE
A. PERMIT AUTHORIZATION		1
B. EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS		2
C. INSIGNIFICANT ACTIVITIES		13
D. SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS		14
E. SOURCE CONTROL EQUIPMENT OPERATING REQUIREMENTS		15
F. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS		16
G. GENERAL PROVISIONS		18
H. ALTERNATE OPERATING SCENARIOS		23
I. COMPLIANCE SCHEDULE		24

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and received a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

- 7        (7)     1<sup>st</sup> Sealer Oven, Glaze Oven  
                 Natural gas-fired oven  
                 4.7 mmBTU/hour, installed 1989
  
- 13       (13)    Two Bake Ovens  
                 Natural gas-fired oven  
                 Each 2.5 mmBTU/hr, installed 1996
  
- 16       (16)    Air house #1 (air makeup unit)  
                 Natural gas-fired  
                 6.0 mmBTU/hr, installed 1989
  
- 17       (17)    Air house #2 (air makeup unit)  
                 Natural gas-fired  
                 18.0 mmBTU/hr, installed 1996

**APPLICABLE REGULATIONS: NA**

- 1.       **Operating Limitations:** None
  
- 2.       **Emission Limitations:** See Section D(2)
  
- 3.       **Testing Requirements:** None
  
- 4.       **Specific Monitoring Requirements:** None
  
- 5.       **Specific Record Keeping Requirements:**  
                 The permittee shall keep records of natural gas usage on a monthly basis.
  
- 6.       **Specific Reporting Requirements:** None

## **SECTION B -EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

1 (1) Sand Booth

**Description:** Woodworking Operations (power/hand tools for cutting, sanding, shaping, touch-up, finish sanding, bag house etc.).  
Maximum Throughput Rate: 600-Board feet per hour.  
Control equipment: Baghouse.  
Various installation dates: 1989-1996

### **APPLICABLE REGULATIONS:**

401 KAR 59:010, New process operations, applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

#### **1. Operating Limitations:**

The rate of materials used in affected facilities shall not produce emissions which exceed the limitations as described in Section B(2) below.

#### **2. Emission Limitations: 401 KAR 59:010, New process operations**

- a. Section 3, PM emissions shall not exceed the allowable rate calculated based on the process weight rate (P) using the following equation:  
 $E = 3.59 P^{0.62}$  Where P is in tons per hour for process weight rate over 0.5 ton per hour.
- b. For P less than or equal 0.5 ton per hour the allowable is 2.34 lbs/hour.

#### **Compliance Demonstration Method:**

Compliance with the mass emission limit is assumed when the baghouse system controls the emissions of particulate matter and is operated properly in accordance with manufacturer's specifications. Also, see Specific Control Equipment Operating Condition (7).

#### **c. Section 3(1) Opacity Standard**

No person shall cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal or greater than twenty (20) percent opacity.

#### **Compliance Demonstration Method:**

The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack weekly and maintain a log of the observations. If visible emissions from the stack are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Monitoring Requirements:** See testing requirements.

**5. Specific Record Keeping Requirements:**

Board feet of wood used and hours of operation for the process shall be recorded on monthly basis. The baghouse pressure drop readings shall be recorded weekly.

**6. Specific Reporting Requirements:**

Any exceedance in the particulate emissions rate or visible emissions standard specified in this permit shall be reported to the Division per General Condition F(3) of this permit.

**7. Specific Control Equipment Operating Conditions:**

The Pneumafil baghouse shall be operational at all times when the woodworking processes are operational. Bags in the baghouse shall be cleaned/replaced as often as needed to ensure good air pollution control practices. Pressure drop, in accordance with the manufacturer's specifications, shall be monitored weekly in order to insure proper operation of the baghouse at all times.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

Wood furniture finishing lines consisting of:

- |    |      |                                                          |
|----|------|----------------------------------------------------------|
| 2  | (2)  | Stain Spray Booth Offline (installed 1989)               |
| 3  | (3)  | Sealer Spray Booth Offline (installed 1989)              |
| 4  | (4)  | Glaze Spray Booth (installed 1989)                       |
| 5  | (5)  | Topcoat Spray Booth (installed 1989)                     |
| 6  | (6)  | Match Sample Spray Booth (installed 1989)                |
| 8  | (8)  | Clean up Area (installed 1989)                           |
| 9  | (9)  | Stain Spray Booth -Mainline (installed 1996)             |
| 10 | (10) | Sealer Spray Booth (2 booths)- Mainline (installed 1996) |
| 11 | (11) | Glaze Spray Booth- Mainline (installed 1996)             |
| 12 | (12) | Top Coat Spray Booth - Mainline Booth (installed 1996)   |

**APPLICABLE REGULATIONS:**

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, is applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2.

401 KAR 59:010, New process operations, applicable to each affected facility or source associated with process operations, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

401KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

**1. Operating Limitations:**

The rate of materials used in affected facilities shall not produce emissions which exceed the limitations as described in Section B(2) below.

**2. Emission Limitations:**

- a. Volatile organic compound (VOC) emissions shall be less than or equal to 225 tons per rolling 12 month period for the entire source.

**Compliance Demonstration Method:**

Compliance with VOC shall be demonstrated by a material balance method consisting of record keeping of primers, base coats, top coats, and solvent utilized, VOC content and resulting emissions, which will be summarized on a monthly basis. The equation for monthly record keeping is as listed in the Section D(2).

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- b. 401 KAR 59:010, New process operations,  
Section 3, PM emissions shall not exceed the hourly allowable rate of 2.34 lbs/hr, per booth.

### **Compliance Demonstration Method:**

Compliance with the mass emission limit is assumed when the filter system controls the emissions of particulate matter and is operated properly in accordance with manufacturer's specifications and/or standard operating procedures as approved by the Division.

- c. 401 KAR 59:010, New process operations,  
Section 3, Visible emissions shall not equal or exceed 20% opacity.

### **Compliance Demonstration Method:**

The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

- d. 401KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

### **Compliance Demonstration Method:**

Within sixty (60) days after issuing the proposed permit, the permittee shall submit a determination to the Division for Air Quality, 803 Schenkel Lane, Frankfort, Kentucky 40601 to verify that all control procedures utilized to minimize VOC's emissions are reasonable, available, and practical in accordance with regulation 401 KAR 50:012.

- e. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

### **Compliance Demonstration Method:**

The source is in compliance with 401 KAR 63:020 based on the emission rates of toxics given in the application submitted by the source. If the source alters process rates, material formulations, or any other factor that would result in an increase of toxic emissions or the addition of toxic emissions not previously evaluated by the Division, the source shall submit the appropriate application forms pursuant to 401 KAR 52:020, Section 3(1)(a), along with modeling to show that the facility will remain in compliance with 401 KAR 63:020.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Monitoring Requirements:** See compliance demonstration method B2(c)

**5. Specific Record Keeping Requirements:**

The permittee shall keep calendar month records of the usage of base coats, clear coats, solvents and clean up solvents or any other VOC/HAP containing material. At the end of each month volatile organic compound (VOC) and hazardous air pollutants (HAPs) emissions shall be calculated and recorded. These records shall be summarized and tons per month VOC/HAP emissions calculated and recorded. Tons of VOC/HAP per 12 months shall be recorded. The recorded tons per 12 months shall be a 12 months rolling total representing the most recent year. These records, as well as purchase orders and invoices for all VOC/HAP containing materials, shall be made available for inspection upon request by duly authorized representatives of the Division for Air Quality.

**6. Specific Reporting Requirements:**

- a. Any deviations from requirements of section B shall be reported.
- b. The VOC emission calculation for each month in the semi-annual period shall be reported.
- c. The combined HAPs emission calculation for each month in the semi-annual period shall be reported.
- d. The rolling 12 month total for VOC during each month in the semi-annual period shall be reported.
- e. The rolling 12 month total of combined HAP's for each month ending in the semi annual period shall be reported.
- f. See Group Requirements and Section F(2)

**7. Specific Control Equipment Operating Conditions:**

Panel filters shall be in place at all times when the spray booths are operating and shall be cleaned/replaced as often as needed to ensure good air pollution control.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****Group Requirements:****Emission Points: 2, 3, 4, 5, 6, 8, 9, 10, 11 and 12****APPLICABLE REGULATIONS:**

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2 (Compliance date: December 7, 1998).

**1. Operating Limitations:**

- A. 40 CFR 63.803(b), **OPERATOR TRAINING:** Personnel involved in finishing, gluing, cleaning, and wash off operations shall be trained in appropriate application, cleaning, and wash off procedures, equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes. This training shall be completed within six months of the compliance date (December 7, 1998) for existing personnel. New personnel shall be trained upon hiring. All personnel shall be given refresher training annually.
- B. 40 CFR 63.803(e), **WASHOFF AND CLEANING SOLVENTS:** Cleaning or wash off solvents that contain any of the pollutants listed in 40 CFR 63, Subpart JJ, Table 4, in concentrations subject to MSDS reporting as required by OSHA, shall not be used. Emissions from wash off shall be further controlled by using normally closed tanks to contain wash off, and orientation of the part to drain as much solvent as possible.
- C. 40 CFR 63.803(f), **SPRAY BOOTH CLEANING:** Compounds containing more than 8.0 percent by weight of VOC shall not be used for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- D. 40 CFR 63.802(b)(3), **STRIPPABLE SPRAY BOOTH COATINGS:** shall contain no more than 0.8 lb VOC per lb solids, as applied.
- E. 40 CFR 63.803(i), **LINE AND GUN CLEANING:** Normally closed containers shall be used to contain all organic solvent used to clean lines and spray guns.
- F. 40 CFR 63.803(g), **STORAGE REQUIREMENTS:** Normally closed containers shall be used for storing finishing, gluing, cleaning, and wash off materials.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- G. 40 CFR 63.803(h), **APPLICATION EQUIPMENT REQUIREMENTS:** Conventional air spray guns shall be used to apply finishing materials only under any of the following circumstances:
- (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  - (2) For touch up and repair under the following conditions:
    - (a) The touch up and repair occurs after completion of the finishing operation; or
    - (b) The touch up and repair occurs after the application of stain and before the application of any other type of finishing material and the material used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
  - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.
  - (4) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period.
- H. 40 CFR 63.803(c), **LEAK INSPECTION REQUIREMENTS:** As a minimum, all equipment used to transfer or apply coatings, adhesives, or organic solvents shall be visually inspected once per month. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected, and final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- I. 40 CFR 63.802(a)(2), **ADHESIVES:** Volatile Hazardous Air Pollutant (VHAP) content of contact adhesives applied to porous substrates shall not exceed 1.0 lb VHAP/lb. Solids as applied.

**2. Emission Limitations:**

40 CFR 63.802, **EMISSION LIMITS FOR FINISH MATERIALS:** Volatile Hazardous Air Pollutant (VHAP) emissions shall not exceed the limits presented in Table 3 of 40 CFR 63 Subpart JJ.

**Compliance Demonstration Method:**

The permittee shall calculate the average VHAP content for all finishing materials used at the facility using the following equation, and maintain a value of E no greater than 1.0 lbs VHAP/ lbs solids:

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n)}{(M_{c1} + M_{c2} + \dots + M_{cn})}$$

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

E= the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.

M<sub>c</sub>= the mass of solids in finishing material used monthly, lb solids/month.

C<sub>c</sub>= the VHAP content of a finishing material in pounds of VHAP per pounds of coating solids.

S= the VHAP content of a solvent, expressed as weight fraction, added to finishing materials.

W= the amount of solvent in pounds, added to finishing materials during the monthly averaging period.

### **3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

### **4. Monitoring Requirements: See Section F**

### **5. Specific Record Keeping Requirements:**

A. **TRAINING PROGRAM:** as specified in 1.c, Operator Training, for personnel involved in finishing, gluing, cleaning, and wash off operations. The program shall include, at a minimum the following:

- (1) A list of all current personnel by name and job description that are required to be trained;
- (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes; and
- (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

B. **LEAK INSPECTION AND MAINTENANCE PLAN** that specifies:

- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
- (2) An inspection schedule;
- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
  - (a) First attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
  - (b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****C. CLEANING AND WASHOFF SOLVENT ACCOUNTING SYSTEM** to include:

- (1) The quantity and type of organic solvent used each month for wash off and cleaning, as defined in 40 CFR 63.801.
- (2) The number of pieces washed off, and the reason for the wash off.
- (3) The quantity of spent solvent generated from each wash off and cleaning operation.

**D. COMPLIANCE REPORT:** In addition, to comply with the provisions of 40 CFR 63.804(a)(1), owner/operators shall maintain records demonstrating that the coatings and thinners are compliant according to Table 3 of 40 CFR 63 Subpart JJ. These records shall include:

- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Table 3;
- (2) The VHAP content (A list of VHAP can be found in Table 2 of Subpart JJ), in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Table 3; and
- (3) The VOC content, in lb VHAP/lb solids, as applied, of each strippable booth coating subject to the emission limits in Table 3.
- (4) Copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E (40 CFR 63.804 (a) (1)).

**E. FORMULATION ASSESSMENT PLAN:** The owner/operator shall prepare and maintain a record which:

- (1) Identifies VHAP from the list in Table 5 of 40 CFR 63 Subpart JJ, that are being used in finishing operations by the affected source;
- (2) If no VHAP from Table 5 of 40 CFR 63 Subpart JJ is used then the record shall reflect that; otherwise
- (3) The owner/operator should follow guidelines for the formulation assessment plan as presented in 40 CFR 63.803 (l), Formulation assessment plan for finishing operations;
- (4) If after November 1998, an affected source uses a Volatile Hazardous Air Pollutant (VHAP) of potential concern as listed in Table 6 of 40 CFR 63 Subpart JJ, and exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedence of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(I) through (l)(4)(iv) of 40 CFR 63.803, the affected source shall follow the procedures established in paragraph (l)(5).

**6. Specific Reporting Requirements:** 40 CFR 63.807

- A. 40 CFR 63.804, **COMPLIANCE CERTIFICATION** signed by a responsible official of the company that owns or operates the affected source to include:

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- (1) Statement that compliant stains, wash coats, sealers, topcoats, base coats, enamels, and thinners, as applicable have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - (2) Statement that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
  - (3) Statement of whether or not the affected source was in compliance, and if not, that measures were taken to bring the affected source in compliance.
  - (4) The permittee shall show continuous compliance with 40 CFR 63.804 (a)(1) by submitting the results of the averaging calculation for each month as required by 40 CFR 63.807(c).
- B. Compliance Certification reports shall be submitted semi-annually. These reports shall be certified by a responsible official, and delivered by electronic media (such as fax or e-mail) or postmarked to the Division's Frankfort Regional Office within thirty days following the end of each semi-annual period. The semi-annual reports are due prior to January 30th and July 30th of each year. These reports may also be delivered by courier as long as the reports are stamped received as indicated above. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.
- C. The permittee shall provide a written notification under 40 CFR 63.803(l)(4) and shall include in the notification one or more statements that explains the reasons for the usage increase (if any). The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

**SECTION C - INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	<u>Description</u>	<u>Generally Applicable Regulation</u>
1.	(14) Weil-McLein natural gas-fired boiler 0.175 mmBTU/hour heat input	NA
2.	(15) 41 space heater @ 0.08mmBTU/hr each (3.3 mmBTU/hr total) natural gas-fired, Installed: 1989-1996	NA
3.	(18) Line #3 Two Bake Ovens Natural gas-fired 1mmBTU/hr and 0.5mmBtu/hr, Installed: 2002	NA

## SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. VOC emissions shall be less than 225 tons per rolling 12 months for the entire source including insignificant activities.

### **Compliance Demonstration Method for VOC:**

Monthly source wide VOC emissions =  $\sum$ [Monthly usage of each coating, solvent, thinner diluent, or any other VOC containing material in pounds or gallons per month] x [VOC fraction] x [appropriate conversion factor (if usage is in gallons) for gallons to pounds for each coating, solvent thinner, diluent, or any other VOC containing material used]

+  $\sum$ [Million cubic feet of natural gas burned each unit] x [5.5 lb VOC/million cubic feet Natural gas]

+  $\sum$ VOC emissions from insignificant activities.

When the total VOC emissions from the given month are added to the previous eleven (11) month totals, the new 12-month rolling total shall not exceed 225 tons.

## **SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS**

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

1. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. All deviations from permit requirements shall be clearly identified in the reports.
2. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request.
3. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.6 [Section 1b (V) 3, 4. of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
4. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
  - a. Identification of the term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period.
  - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

**SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality  
Frankfort Regional Office  
643 Teton Trail, STB 200  
Frankfort, KY 40601

U.S. EPA Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

Division for Air Quality  
Central Files  
803 Schenkel Lane  
Frankfort, KY 40601

5. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.
6. Pursuant to Section VII (3) of the policy manual of the Division for Air Quality as referenced in 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork.

## SECTION G - GENERAL PROVISIONS

### (a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020 Section 26].
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
  - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
  - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
  - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].
11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].
15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
- Applicable requirements that are included and specifically identified in the permit and
  - Non-applicable requirements expressly identified in this permit.

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].
2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements  
None

(e) Acid Rain Program Requirements

If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

### (f) Emergency Provisions

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
  - a. An emergency occurred and the permittee can identify the cause of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
  - e. This requirement does not relieve the source of other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

### (g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

RMP Reporting Center  
P.O. Box 3346  
Merrifield, VA, 22116-3346

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

### (h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

- b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
  - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

**SECTION H - ALTERNATE OPERATING SCENARIOS**

None

**SECTION I - COMPLIANCE SCHEDULE**

None